



U.S. Department of Justice
Civil Rights Division

DJP:JMG:SAS:CFG:es
DJ 170-64-148

*Employment Litigation Section - PHB
950 Pennsylvania Avenue, NW
Washington, DC 20530
www.usdoj.gov/crt/emp*

June 19, 2006

Via Facsimile

Gerald J. Villella
Office of the City Solicitor
626 State Street, Room 505
Erie, Pennsylvania 16501

Re: United States v. City of Erie, C.A. No. 04-4 (W.D. Pa.)

Dear Counsel:

As you know, the entry of the Consent Decree last week established deadlines for various tasks the parties must undertake in order to complete the claim process and prepare for the Fairness Hearing on Individual Relief. The following is a list of those deadlines:

- | | |
|--|---|
| June 15 | Court entered the Decree |
| June 23 (Friday) | ¶ 47 - within 10 days later, the City must send notice of the entry of the Decree and the claim form to claimants (Appendices D and E) |
| July 8 (Saturday) | ¶ 48 - 25 days after entry of Decree, claimants must submit claim forms. |
| Sept. 6 (Wednesday) | ¶ 49 - 60 days later (i.e., 85 days after entry of Decree), the United States must file a Relief Awards List and serve a copy on the City along with copies of all claim forms received |
| on or about Sept. 6 | ¶ 50 - Upon filing the Relief Awards List, the United States moves for a fairness hearing on individual awards |
| | ¶ 50 - The Court sets the date for the fairness hearing (to be at least 60 days later) |
| No earlier than
Nov. 6 (Monday) | Fairness Hearing on Individual Relief |

Please let me know immediately if you disagree with any of the dates or required actions set forth above.

As this schedule indicates, the City must send a copy of Appendix D and Appendix E to all claimants no later than this Friday, June 23. Of course, June 15, 2006 should be inserted as the date in the first line of Appendix D. As indicated above, the date to be inserted in the fourth is July 8, 2006. That date, July 8, 2006, also should be inserted in the last paragraph of Appendix D. In addition, the same 1-800 telephone number and Department of Justice address that were used previously for the Instructions for Filing an Objection Prior to the Fairness Hearing should be inserted in the appropriate places in the fifth paragraph of Appendix D.

We have received updated contact information for some claimants listed on Appendix A. This information is included in the enclosed revised claimant list; the revisions are in bold type. In addition, as you know, the Court ordered that Ethel Easter and Frances (Green) Booth be added to the list of claimants subject to their establishing at the Fairness Hearing on Individual Relief that they took and failed the PAT between 1996 and 2002. The contact information that we have for each of these individuals is:

Ethel Easter
611 N. Dairy Ashford, Apt. 77
Houston, Texas 77079

Frances Booth
928 E. 10th Street
Erie, Pennsylvania 16503

In order to comply with the schedule set forth above, as soon as possible after the United States begins receiving claim forms from individuals who indicate that they are interested in relief, we will begin evaluating the claimants to determine which individuals we believe should awarded monetary relief and/or consideration for priority hiring. Depending on the number of claimants who indicate an interest in relief, we likely will use some combination of questionnaires and interviews to obtain the information we need to make informed decisions.

Before we can prepare a questionnaire or determine what questions will be asked, we need detailed information from the City regarding the post-PAT steps in its selection process. Specifically, for each of the selection processes between 1996 and 2002, please provide a detailed description of the factors that would have disqualified an applicant who passed the PAT. For example, based on documents and deposition testimony obtained during liability phase discovery, we are aware that criminal history and driving record were considered during the background investigation, but do not know precisely what in an applicant's criminal history or driving record would disqualify her.

I have enclosed a copy of a questionnaire that apparently was used by the City as part of

its 1994 selection process. If answers to any of the questions asked might disqualify an applicant, please explain specifically what information would lead to disqualification. If the standards that the City used changed at any time during the relevant period, please describe the changes. In addition, please inform me as soon as possible if a questionnaire different than the enclosed 1994 form was used between 1996 and 2002, and describe any differences.

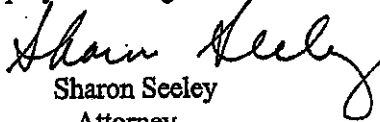
I would appreciate it if you would provide the requested information as soon as possible so that the United States can take it into account in making its eligibility determinations. As always, you can reach me at (202) 514-4761 if you have any questions.

Sincerely,

David J. Palmer
Chief

Employment Litigation Section

By:


Sharon Seeley
Attorney
Employment Litigation Section

cc: Julie Wasielewski

Encl.

Claimant List - June 19, 2006

2002		
Sherrod (Battles)	Trelane	411 West 17 th Street Erie, PA 16502
Booth	Frances	928 E. 10 th Street Erie, PA 16503
Brophy	Shannon	1237 Priestley Avenue Erie, PA 16511
Chase	Dawn	200 W 20 th Street Erie, PA 16502
Frey	Cheryl	4806 Perkins Street Erie, PA 16509
Harris	Joanne	1653 Treetop Drive Apt. 8A Erie, PA 16509 OR 13820 Ridge Road West Springfield, PA 16443
Heatherdale	Shannon	310 Charles Street Ridgeway, PA 15853
Hernandez	Marsha	34 Center Street Union City, PA 16438 OR 216 East St. Waterford, PA 16441
Hedlund-Jackula	Amber	849 Rumsey Avenue Erie, PA 16511
Knepper	Jeannine	411 Cranch Avenue Erie, PA 16511

Lewis	Jamie Lynne	2411 Pennsylvania Avenue Erie, PA 16503
Luke	Marcie	1856 Fairmont Parkway Erie, PA 16510
Morris	Dorcas Ann	2550 East 43 rd Street Erie, PA 16510
Rodgers	Sue Yong	2734 West 35 th Street Erie, PA 16506
Schmeisser	Mary	2614 Van Buren Avenue Erie, PA 16504
Sidun-Lego	Cheryl	2828 Florence Avenue Erie, PA 16504
Widomski	Heather	1437 E. 7 th Street Erie, PA 16503 OR 613 E 4 th Street Erie, PA 16507
2000		
Abreu	Brenda	440 E 17 th Street Erie, PA 16503 OR 15 Hess Avenue Apt. 1 Erie, PA 16503
Angelo	Stacy	655 1/2 E 14 th Street Erie, PA 16503
Cooper	Sabrina	505 Popular Street Erie, PA 16507

Crissman	Bertha	648 & ½ E. 17 th Street Erie, PA 16503 OR 423 East 25th Street Erie, PA 16503
Devlin	Heather	2542 W 21 st Street Erie, PA 16506
Dudics	Julia	3761 Hartman Road Erie, PA 16510
Flak-Boyajian	Dawn	617 Elm Court Erie, PA 16506
Gibbs	Fatima	1304 W 25 th Street Apt. 1 Erie, PA 16502
Hagerty	Aubrea	3110 Holland Street Erie, PA 16504 OR 803 State Road 2 Croydon, PA 19021
Hall	Melissa	3926 Garden Avenue Erie, PA 16508
Hayes	Lisa Marie	11672 Fry Road Edinboro, PA 16412
Karuba	Audrey	901 Leeward Road Venice, Florida 34293 OR 1239 East 22nd Street Erie, PA 16503
Kinder	Samantha	879 Ruth Avenue Erie, PA 16509

Lococo	Maria	1366 West 34th Street Erie, PA 16508
Lolley	Corrina	4009 William Clark Trail Monroe, NC 28110
Marshall	Kathy	922 Weschler Avenue Erie, PA 16502
Nicholson-Lanager	Carrie	927 West 36th Street Erie, PA 16508
Petrick (DeHaas)	Tricia	6039 Meridia Drive Erie, PA 16509
Pollock	Stacy	1960 West 27th Street Erie, PA 16508
Ponting	Amanda	5101 Zessinger Road McKean, PA 16426
Quinones	Luz	415 Plover Street Dunkirk, NY 14048 OR 1433 Buffalo Road Erie, PA 16503
Roberts	Tabitha	2312 Cameron Rd. Erie, PA 16510
Rodgers	Sue Yong	2734 West 35th Street Erie, PA 16506
Santey Geeting	Tammy	27 Franklin Drive Edinboro, PA 16412
Schmeisser	Mary	2614 Van Buren Avenue Erie, PA 16504
Still	Tamilyn	22951 Freyermuth Road Meadville, PA 16335
Sul	Elizabeth	3018 Oakwood Street Erie, PA 16508

Thompson	Mae	3106 Belmont Drive Killeen, TX 76549 OR 4041 Stanton Street Erie, PA 16510
Thompson	Zabrina	639 W 22 nd Street Erie, PA 16502
Veshecco Meyer	Natalie	2426 Bird Drive Erie, PA 16510
1998		
Bradley	Nicole	521 Rondeau Drive Erie, PA 16505
Dunkle	Heather	5048 Iroquois Avenue Erie, PA 16511
Edelmann	Susan	1022 Long Point Drive Erie, PA 16505
Harris	Joanne	13820 Ridge Rd. West Springfield, PA 16443
Hopkins	Kimberly	413 34th Street Erie, PA 16504
Lindner	Stephanie	2716 Pennsylvania Avenue Erie, PA 16504
Lorei-Weismiller	Kristin	8682 Oriole Drive Erie, PA 16509
McConahy Nicholson	Carey	3328 Saltsman Rd. Erie, PA 16510
Nicholas	Kimberly	
Osterberg	Denise	614 Wayne Street Erie, PA 16503
Peters (Wolcott)	Linda	1264 Maple Avenue Lake City, PA 16423

Romigh	Megan	1123 Chestnut Street Monaca, PA 15061
Schmeisser	Mary	2614 Van Buren Avenue Erie, PA 16504
Sidun-Lego	Cheryl	2828 Florence Avenue Erie, PA 16504
Stoops	Kimberly	1403 Juniper Drive Apt. 2 Louisville, KY 40222
Waite	Emily	
Weislogel (Downing)	Darlene	107 Andrews Park Blvd. Erie, PA 16511
1996		
Agnello Peterson	Michele	4921 Amy Avenue Erie, PA 16504
Chapman Coleman	Natalie	3023 Spruce Drive Erie, PA 16506
Curtis	Maryann	2709 Pearl Avenue Erie, PA 16510 OR 1318 East 9th Street Second Floor Erie, PA 16503
Easter	Ethel	611 N Dairy Ashford, Apt. 77 Houston, Texas 77079
Feltyn	Amy Lynne	3005 Brandes Street Erie, PA 16504
Fuller (Jaramillo)	Deborah Lee	4015 Melrose Avenue Erie, PA 16509

Gamble	Luvonnise	1720 Holland Street Erie, PA 16503 OR 810 W. 8 th Street Erie, PA 16502
Garcia	Judith	1231 East 21st Street Erie, PA 16503
Hansen Smith	Heidi A.	1175 Firehouse Road Louisa, VA 23093
Harris	Nina	552 E College Street Meadville, PA 16335
Hetrick	Joyce	1011 West 26th Street Erie, PA 16508
Hoover	Michelle	5325 Loomis Street North East, PA 16428
Jones	Barbara	12286 Lakeside Drive Conneaut Lake, PA 16316
Koenig	Venus	1419 Cold Springs Drive Erie, PA 16508
Lagan Mazur	Jennifer	1527 West 32nd Street Erie, PA 16508
Machalinski	Marlo Marie	818 Delaware Avenue Erie, PA 16505
Mills (Burton)	Linda	4162 Fargo Street Erie, PA 16510
Morgan	Jessica Dawn Marie	<u>Use through June 2006:</u> 3808 W Zelma Street, Apt. 3 Edinburg, TX 78541 <u>After June 2006, use:</u> Jessica Morgan c/o April Chase 1433 East 33 rd Street Erie, PA 16504

Pollock	Stacy	1960 West 27th Street Erie, PA 16508
Rosas	Yolanda	1840 E 7th Street Erie, PA 16511
Runstedler	Jennifer	2676 Hazel Street Erie, PA 16508 814-868-0039
Santiago	Mary Ann	1038 E. 30 th Street Erie, PA 16504
Sauro	Christine	22 Aspen Drive Apt. B Greensboro, NC 27409
Sessaman	Crystal	11 Valley Street Lewistown, PA 17044
Staszewski Moubarak	Jennifer T.	803 Harmony Drive Erie, PA 16505
Stover	Carla	9868 Agnew Road Linesville, PA 16424
Tate	Ebony	1859 Woodlawn Avenue Erie, PA 16510
Wingerter O'Laughlin	Teresa	2521 Bird Drive Erie, PA 16510